

From: [REDACTED]
Sent: 23 September 2019 13:21
To: [REDACTED]; Admin Support
Subject: Perth; Registry Angus Smith
CAS Assessment - PPC/E/0020065(436242) - Poor

Please find below CAS report for PPC/E/20065

Please do not hesitate to contact me if you wish to discuss this report further.

Kind regards

1. Assessment Summary

Licence reference number: PPC/E/0020065

ELC assessment: Minor Breach(es) / 1 Gross Breach

Interim EMC assessment: Low Performance

Overall interim assessment: Poor

Safety risk assessment for site (Is the current RA adequate? Are there any particular additional risks?)

2. Assessment Details

Date and time of assessment: 16/09/2019 10:00

Site name: 2 Sisters Poultry Limited, Coupar Angus

Site address: George Street, Coupar Angus, PH13 9LU

Assessment type: Standard inspection

3. Components of licence assessed

Environmental Limit Condition (ELC)

ELC Assessment

Licence condition number	ELC assessment - (compliant, minor, repeated minor, gross or significant)	Description of non-compliance with ELC (include follow-up actions to rectify non-compliance, timescales and reporting requirements) - Where several breached ELCs are linked, refer to first condition number and associated non-compliance described
3.3.1	No Breaches	Odour assessment carried out prior to inspection, no offensive odour detected.
3.5.2	No Breaches	-

3.8.3	No Breaches	-
3.9.1	Minor	IBC not stored in bund

Environmental Management Condition (EMC)

EMC Assessment

EMC attribute	Licence condition number	EMC assessment - (compliant, minor, major)	Overall assessment	Description of non-compliance with EMC (include follow-up actions to rectify non-compliance, timescales and reporting requirements) - Where there is a link to a breached ELC refer to condition number as identified above
Maintenance of processes, plant and installations to relevant standards	implied undefined	Major	Major	Carbon replacement for feather shed outstanding

4. Discussions

SEPA officer Emma Kennedy (EK) carried out a FIDOL assessment in Coupar Angus prior to visiting the site, on this occasion no offensive odour was detected (Condition 3.3.1). EK met Alex Brown (AB), Brian Glennie (BG), Ross Macgregor (RM) and Anna Misztal (AM) on site. Present on the site walk over was EK, RM and AM.

Four to six weekly meetings have been taking place between the operator and SEPA. Points discussed and outstanding actions;

- Systematic review (condition 3.3.2) still outstanding. AB advised that work has been conducted to identify all the potential odour sources on site, these have to be formally mapped and presented to SEPA.
- The activated carbon abatement on site is critical to odour control and so therefore requires careful management to ensure its effectiveness. It is unknown by the operator when the single filter located external to the feather shed was last replaced. This requires immediate attention and replacement.
- Use of hand-held odour monitoring devices on site: Provisional Standard Operating Procedure (SOP) for the site proposed the use of hand-held devices, in particular PID (photoionization detector). This has still to be implemented and taken forward by the site. Discussion regarding their introduction were again re-visited in May 2019, yet it has still to be actioned. The site has confirmed they are investigating the costs with the intention to purchase. This requires immediate action as its introduction is expected to prove a valuable tool in better aiding the site to understand / determine the replacement frequency for the carbon abatement, therefore potentially reducing odour complaints.
- Depletion of hypochlorite (condition 4.1.3). Following on from the previous CAS report the site was due to notify SEPA in writing of what procedures / changes are being put in place to prevent a repeat of this incident. This was not actioned. EK addressed this issue at the meeting, RM advised a spare supply is now available on site and there is clearer segregation of materials between the

engineering and hygiene department. BG advised that better internal communications are to be promoted on site as often each department works independently and not as a 'whole'.

- Noise (condition 3.1): The noise report has been completed (August 15th 2019) following completion of the bays. Action- Report to be forwarded to SEPA.
- Introduction of a pro forma for odour complaints: This is still outstanding but will be carried forward by the AM, information gathered from the Systematic review will aid its completion.
- Name change: from 2 Sisters Poultry Limited to 2 Sisters Food Group; paper work to be submitted to SEPA.

Site walk over:

- Incident Prevention (condition 3.9.1) Chemicals were being stored outwith a bunded area. Highlighted at time of inspection, requires immediate action.
- Hardstanding (concrete): Concrete on site is in poor condition in places (not impermeable/ cracked and uneven) (condition 2.8.1) CAPEX was approved for concrete improvements in 2018, yet the improvements have yet to be undertaken. RM and AA advised that they had been informed the improvements are imminent this year. Site to update on how this is progressing.
- Extractor fans: RM is investigating reducing the number of extractor fans operational to help mitigate odour.
- Drain cleaning: Trial of an external contractor to clear the internal drains to help better prevent build ups and blockages.
- Putrescible waste (3.8.3) was being stored in accordance with the Permit conditions.
- The new delivery bays are complete and being used in part, temporarily for the location of refrigeration units. The site is to remain vigilant that this is not causing a nuisance to local residents who may experience noise issues at night. To date SEPA has not received any noise complaints from local residents regarding their presence.

5. Assessment specific details

Other SEPA staff present:

Operator representatives met on site:

Relevant weather: Dry / sunny

6. Assessment sign-off

Name of inspecting officer:

Team name: Perth

7. Office information only

Was the inspection announced?: Yes

Adhoc / Follow Up:

Inspection code: 320289PPC
Schedule type: EAST_OPS-PERTH-PERTH
Month scheduled: JAN
Month completed: 16/09/2019
Registry copy required? Yes
File reference: PPC/E/20065

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